

BROMBERG LAW OFFICE, P.C.

Brian L. Bromberg (Admitted in NY, NJ & CA)
Joshua Tarrant-Windt (Admitted in NY)

352 Rutland Road #1
Brooklyn, NY 11225
Phone: (212) 248-7906
Fax: (212) 248-7908

December 29, 2020

Via ECF & Email

Honorable Cathy Seibel, U.S.D.J.
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Re: McClain v. AutoExpo Ent. Inc., et al., 20-CV-5054 (CS)

Dear Judge Seibel:

My office, together with co-counsel, represents the plaintiff, Nikkia McClain, in the above-referenced action.

I am writing to apologize for not filing a revised complaint by yesterday's deadline. This failure was a result of a family medical emergency that started on December 4, 2020. I have related the details to Paul H. Aloe, Esq., but I do not want to make the private medical details part of the public record. If necessary, however, I can file a declaration under seal.

Because of this emergency, I am requesting an extension to the deadline to amend to January 6, 2021. All parties have consented to this request, provided all of the dates are adjusted by eight days, including the deadline for defendants to move with respect to the anticipated amended complaint (*i.e.*, January 27, 2021).

Respectfully,

/s/ Brian L. Bromberg
Brian L. Bromberg

cc: All Counsel of Record (Via ECF)